

Approved: T. JOSHUA PERTZ  
Assistant United States Attorney

Before: THE HONORABLE PAUL E. DAVISON  
United States Magistrate Judge  
Southern District of New York  
22-mj-00502

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UNITED STATES OF AMERICA	:	<u>SEALED COMPLAINT</u>
	:	
- v. -	:	Violations of
	:	18 U.S.C. §§ 1028, 1028A,
MICHAEL KRUISE WILLIAMS, and	:	1344, and 2
PEDRO VASQUEZ,	:	
Defendants.	:	COUNTIES OF OFFENSE:
	:	BRONX and WESTCHESTER
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SOUTHERN DISTRICT OF NEW YORK, ss.:

THOMAS E. WILBERT, being duly sworn, deposes and says that he is a Special Agent with Homeland Security Investigations, and charges as follows:

COUNT ONE  
(Conspiracy to Commit Fraud Relating to  
Identification Documents)

1. From at least in or about 2017 up to and including in or about February 2021, in the Southern District of New York and elsewhere, MICHAEL KRUISE WILLIAMS and PEDRO VASQUEZ, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to violate Title 18, United States Code, Sections 1028(a)(1), 1028(a)(2), 1028(a)(3), and 1028(a)(6).

2. It was a part and an object of the conspiracy that MICHAEL KRUISE WILLIAMS and PEDRO VASQUEZ, the defendants, and others known and unknown, knowingly and without lawful authority would and did produce, in and affecting interstate and foreign commerce, an identification document, authentication feature, and a false identification document, in violation of Title 18, United States Code, Section 1028(a)(1).

3. It was further a part and an object of the conspiracy that MICHAEL KRUISE WILLIAMS and PEDRO VASQUEZ, the defendants, and others known and unknown, knowingly would and did transfer, in and affecting interstate and foreign commerce, an identification document, authentication feature, and a false identification document knowing that such document and feature was stolen and produced without lawful authority, in violation of Title 18, United States Code, Section 1028(a)(2).

4. It was further a part and an object of the conspiracy that MICHAEL KRUISE WILLIAMS and PEDRO VASQUEZ, the defendants, and others known and unknown, knowingly would and did possess with intent to use unlawfully and transfer unlawfully, in and affecting interstate and foreign commerce, five or more identification documents (other than those issued lawfully for the use of the possessor), authentication features, and false identification documents, in violation of Title 18, United States Code, Section 1028(a)(3).

5. It was further a part and an object of the conspiracy that MICHAEL KRUISE WILLIAMS and PEDRO VASQUEZ, the defendants, and others known and unknown, knowingly would and did possess an identification document and an authentication feature that appeared to be issued by and under the authority of the United States, which document and authentication feature were stolen and produced without lawful authority, knowing that such document and authentication feature were stolen and produced without such authority, in violation of Title 18, United States Code, Section 1028(a)(6).

(Title 18, United States Code, Section 1028(f).)

COUNT TWO

(Production of False Identification Documents)

6. From at least in or about 2017 up to and including February 2021, in the Southern District of New York and elsewhere, MICHAEL KRUISE WILLIAMS, the defendant, did knowingly and intentionally and without lawful authority produce one or more false identification documents, to wit: WILLIAMS created false identification cards, including a Social Security identification card, safety certification cards from the Occupational Safety and Health Administration, and driver's licenses from several states, in and in a manner affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 1028(a)(1),  
1028(b)(2)(A), 1028(c)(3)(A), and 2.)

COUNT THREE

(Transfer of False Identification Documents)

7. From at least in or about October 2019 up to and including July 2020, in the Southern District of New York and elsewhere, PEDRO VASQUEZ, the defendant, did knowingly and intentionally and without lawful authority transfer an identification document, authentication feature, and a false identification document knowing that such document and feature was stolen or produced without lawful authority, to wit: VASQUEZ requested the production of false identification cards (including Social Security identification cards, safety certification cards from the Occupational Safety and Health Administration, and driver's licenses from several states), and when VASQUEZ received the false documents, he distributed these documents for money, in and in a manner affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 1028(a)(2),  
1028(b)(2)(A), 1028(c)(3)(A), and 2.)

COUNT FOUR

(Bank Fraud)

8. From at least in or about January 2018 up to and including in or about February 2021, in the Southern District of New York and elsewhere, MICHAEL KRUISE WILLIAMS, the defendant, willfully and knowingly, did execute and attempt to execute a scheme and artifice to defraud a financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, WILLIAMS opened a bank account ("Account-1") in the name of an unwitting individual ("Victim-1"), then used Account-1 to conduct transactions for WILLIAMS's own purposes, including depositing checks that WILLIAMS himself stole.

(Title 18, United States Code, Section 1344.)

COUNT FIVE  
(Aggravated Identity Theft)

9. From at least in or about January 2018 up to and including at least in or about February 2021, in the Southern District of New York and elsewhere, MICHAEL KRUISE WILLIAMS, the defendant, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, using identification in the name of Victim-1, WILLIAMS registered Account-1 in the name of Victim-1, and transacted in Account-1, including by depositing stolen checks, without Victim-1's knowledge or authorization, during and in relation to the bank fraud alleged in Count Four of this Complaint.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b),  
and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

10. I am a Special Agent with Homeland Security Investigations ("HSI"). I have been personally involved in the investigation of this matter. This affidavit is based upon my personal participation in the investigation of this matter, as well as on my conversations with other law enforcement officers and others, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts I have learned during the investigation. Where the contents of documents or the actions, statements, or conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

Overview of the Scheme to Produce and Distribute  
False Identification Documents

11. From my conversations with witnesses and my review of bank records, records of other financial service companies, electronically stored information seized pursuant to search warrants, surveillance video, and discussions with other law enforcement officers, I have learned of a scheme to produce false identification documents (the "Fake Documents Scheme") that functions as follows:

a. Since at least in or about 2017, MICHAEL KRUISE WILLIAMS, the defendant, has produced fake identification documents of various types, including state driver's licenses, Social Security identification cards, and certification cards purporting to have been issued by the Occupational Safety and Health Administration ("OSHA"). WILLIAMS produced fake documents, in part, from an office he rented in Norwalk, Connecticut ("WILLIAMS's Office"), using a special identification card printer, as well as holograms that he had purchased from China. WILLIAMS resides in Mamaroneck, New York ("WILLIAMS's Residence").

b. WILLIAMS has sold these documents in part with the assistance of PEDRO VASQUEZ, the defendant. VASQUEZ has sold and distributed a variety of fake identification documents created and provided by WILLIAMS, including OSHA certification cards, state driver's licenses, and Social Security identification cards. VASQUEZ has marketed these fake documents using the internet, and sold fake documents in, among other places, the Bronx, New York, making thousands of dollars in illicit revenue.

VASQUEZ's Marketing and Sale of False Identification Documents

12. Based on my communications with and review of investigative reports and other documents provided by investigators with the New York State Office of Inspector General ("NYSOIG"), I have learned the following, in substance and in part:

a. In or about March 2019, a private compliance and risk monitoring firm ("Compliance Firm-1") informed NYSOIG that Compliance Firm-1 had been conducting worker interviews on the site of a New York State-funded construction project in New York, New York, and had discovered that an individual working at that site ("Construction Worker-1") had presented a false credential (the "Fake OSHA Card"), purporting to certify that Construction Worker-1 had completed a safety course approved by OSHA.<sup>1</sup> The Fake OSHA Card had the appearance of a valid credential,

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<sup>1</sup> Based on a review of documents from the NYC Department of Buildings and OSHA, NYSOIG learned that the NYC Department of Buildings requires that an individual undergo safety training before working on a construction site in New York City. This training may be provided by a third party, who must first obtain OSHA certification as a trainer. After an individual has completed

but based on a review of an online database that verifies OSHA credentials, Compliance Firm-1 and NYISOIG learned that the card's serial number was invalid.

b. Based on an interview with Construction Worker-1, NYISOIG learned that Construction Worker-1 had obtained the Fake OSHA Card by communicating with an individual who used a phone number ending in 9804 ("VASQUEZ's Phone Number"),<sup>2</sup> and paying that individual through the electronic funds transfer application Cash App.

c. Based on the interview with Construction Worker-1 and a review of transaction records and subscriber records from Cash App, NYISOIG learned that, on or about January 4, 2019, an account registered to an individual with the same surname as Construction Worker-1 transferred funds to an account registered under the name "Pedro Vasquez" ("VASQUEZ'S Cash App Account"). VASQUEZ'S Cash App Account was registered with the phone number of VASQUEZ's Phone Number. Based on a review of a public records database available to law enforcement, NYISOIG learned that VASQUEZ's Phone Number was associated with an individual named "Pedro Vasquez."

d. On or about October 15, 2019, an investigator with NYISOIG ("Investigator-1") communicated by text with VASQUEZ's Phone Number. Investigator-1 sent text messages stating, in substance and in part, that he needed an OSHA card, and had been told that the user of VASQUEZ's Phone Number could provide one. The user of VASQUEZ's Phone Number responded by text, and, in substance and in part, agreed to provide a false OSHA credential, requested a full name and date of birth, and arranged a time and place to meet.

e. On or about October 21, 2019, at a certain address in the vicinity of East 149<sup>th</sup> St. and Jackson Ave in Bronx, New York, an undercover agent with NYISOIG ("UC-1") met an individual who identified himself as "Pesos," and who, as explained below, was later identified as PEDRO VASQUEZ, the defendant.

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the training, the trainer provides the individual with a credential certifying that the individual has completed the training.

<sup>2</sup> Based on my review of subscriber records from T-Mobile, I know that VASQUEZ's Cellphone-1 has been active since at least on or about August 21, 2019 and is subscribed to "Kelly Vasquez." As set forth further herein, I believe it is used by PEDRO VASQUEZ.

VASQUEZ provided UC-1 a false OSHA credential, bearing the OSHA logo, in exchange for \$150.00 cash.

f. UC-1 met with and made cash purchases of false identification from VASQUEZ on several other occasions, including on or about November 4, 2019, November 18, 2019, November 21, 2019, January 17, 2020, and July 8, 2020. UC-1 would provide VASQUEZ with identifying information, such as names, dates of birth and photographs, and VASQUEZ would provide identification documents that corresponded, in substance and in part, to that personal identifying information. The false identification documents that VASQUEZ sold to UC-1 include several OSHA cards, Social Security identification cards, and driver's licenses from several states. Investigator-1 conducted in-person surveillance at each of the meetings between VASQUEZ and UC-1, and at least one of the transactions, occurring on or about July 8, 2020 in Bronx, New York, was captured on audio and video surveillance. On each occasion, UC-1 communicated with VASQUEZ by contacting VASQUEZ's Phone Number.

g. Based on a review of a New York State DMV photo of VASQUEZ, and a comparison with surveillance footage of meetings between UC-1 and "Pesos," as well as Investigator-1's personal observations during in-person surveillance, Investigator-1 has identified the individual with whom UC-1 met as VASQUEZ. In addition, based in part on the above-described association of VASQUEZ'S Cash App Account with VASQUEZ'S Phone Number, the registration of VASQUEZ'S Phone Number to an individual with the surname "Vasquez," and the above-described association of VASQUEZ'S Phone Number with "Pesos," NYISOIG believes that "Pesos" is an alias for VASQUEZ.

h. Based on a review of subscriber information and transaction records from Cash App, NYISOIG has learned that, between in or about June 2018 and in or about December 2019, VASQUEZ'S Cash App Account received multiple payments whose senders had labeled them in the memo/subject line as regarding "ID," including phrases such as "id" and "id card!!," as well as "osha cards." NYISOIG has also learned that, between in or about January 2019 and in or about May 2020, VASQUEZ'S Cash App Account made multiple payments amounting to approximately \$61,000 to an account with financial services company Square, registered to "Graphic Expert" (the "Graphic Expert Square Account").

i. Based on a review of publicly available posts on Facebook, NYISOIG has learned that a user named "Pedro



Vasquez," whom NYISOIG believes based on participation in this investigation to be VASQUEZ, has made multiple posts that NYISOIG believes, based on training and experience, advertise fake identification for sale. For instance, on or about January 4, 2017, VASQUEZ posted, "I GOT EM OSHA POPPIN WHATS THE WORD [100 emoji]." And on or about March 19, 2019, VASQUEZ posted, "Osha cards same day process n scaffold lets go SHARE THIS PLZ OR TAG FRIENDS."

#### WILLIAMS's Manufacture of False Identity Documents

13. Based on my review of chat messages stored on a hard drive recovered from WILLIAMS's Residence pursuant to a search warrant, I have learned the following, in substance and in part:

a. On or about September 29, 2017, MICHAEL KRUISE WILLIAMS, the defendant, wrote the following chat messages to another individual ("Individual-1"), in substance and in part: "I bought the holograms too from China," "I know it serious[,] But I don't promote to nobody[,] "Only deep criminals"[,] "Just got the latest templates," "Also offer Birth Certificates . . . Employee ID's . . . Credit Cards . . . Employment Authorization Card . . . NYPD Card . . . US Passport."

b. On or about September 30, 2017, WILLIAMS wrote the following chat messages to Individual-1, in substance and in part: "Got the holograms today by the way . . . I got 5 states for now . . . 10 EACH FOR THESE FOLLOWING STATES[:] NJ[,] CA[,] CT[,] TX[,] FL."

c. On or about October 2, 2017, WILLIAMS wrote the following chat messages to Individual-1, in substance and in part: "Busy doing the orders I had for the ID's . . . Bro I had tons of orders before[e] the id printer came. I was nervous cuz I took a lot of ppl money."

14. Based on a review of subscriber information and transaction records provided by Square, I have learned that, between in or about February 2019 and in or about May 2019, the Graphic Expert Square Account received more than a dozen payments whose senders had labeled them in the memo/subject line as regarding "ID," including phrases such as "Florida id," "for 3 ID's," "CT Id," and "ID rush shipping." NYISOIG also learned that the phone number registered to the Graphic Expert Square



Account was a phone number ending in 3754<sup>3</sup> ("WILLIAMS's Phone Number"), the email address registered to the Graphic Expert Square Account was Mike@wolfpacpc.com, and the display name for the account is "Michael Williams."

15. Based on a review of call logs and subscriber records provided by T-Mobile, I have learned that, during the period from approximately on or about November 1, 2018 and on or about April 13, 2019, VASQUEZ's Phone Number communicated over 600 times with WILLIAMS's Phone Number.

16. Based on a review of transaction records provided by a Florida-headquartered company that sells various items used for the production of identification cards ("ID Products Company-1"), I have learned that since in or about 2017, MICHAEL KRUISE WILLIAMS, the defendant, had purchased several items used for the production of identification documents, including an ID printer and blank ID cards. ID Products Company-1 shipped products to recipients including "Michael Williams" and "Wolfpac Technologies Attn: Michael Williams," at WILLIAMS's Residence.

17. Based on a review of account registration documents provided by PayPal, I have learned that a PayPal account ending in 3897 (the "Expert Imaging PayPal Account") is registered to "Michael Williams," with the "Business Name" listed as "Expert Imaging." The Expert Imaging PayPal Account lists a Social Security number which MICHAEL KRUISE WILLIAMS, the defendant, previously provided to the Mamaroneck Police Department ("WILLIAMS's SSN"). Based on a review of transaction records provided by PayPal, I have learned that, on or about May 21, 2018, the Expert Imaging PayPal Account sent approximately \$115 to a recipient whose name is listed as "谢冲" (Chinese characters transliterated as "Xie Chong") with the "Note" for the transaction reading, "20 New Jersey, 10 Florida, 10 Connecticut, 10 PA." The Expert Imaging PayPal Account sent other payments to the same recipient, and those other transactions included Notes such as "Payment for Holo Order," or "PAYMENT FOR HOLOS." Based on my training, experience and

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<sup>3</sup> Based on my review of subscriber records from T-Mobile, I have learned that the WILLIAMS's Phone Number has been active since at least on or about October 3, 2018, and is subscribed to "Wolfpac none Inc." For the reasons set forth herein, I believe that WILLIAMS's Phone Number is used by MICHAEL K. WILLIAMS, the defendant.

participation in this investigation, I believe these Notes to refer to holograms for identification cards, including state identification cards for New Jersey, Florida, Connecticut and Pennsylvania.

18. Based on my participation in this investigation, I have learned the following, in substance and in part:

a. On or about July 8, 2020, HSI received information from officers of Customs and Border Protection, assigned to the JFK Mail Facility, regarding the seizure of a parcel containing laminates with holograms (the "Holograms Package"). The laminates with holograms resembled state driver's license authentication features for Connecticut, New Jersey, Pennsylvania and Florida.

b. The consignee for the Holograms Package was listed as "Wolfpac Technologies," along with the name of Victim-1, and an address on Katonah Avenue in the Bronx, New York (the "Katonah Ave Address").

c. Based on my conversations with other HSI special agents, I know that on or about July 14, 2020, HSI special agents visited the Katonah Ave Address, and found that it was a small tax consulting business that also provides a private mailbox service. HSI agents spoke to the owner of the business ("Business Owner-1"), who stated that the address written on the Holograms Package corresponded to mailbox 174 at the Katonah Ave Address, and that the mailbox was rented by MICHAEL KRUISE WILLIAMS, the defendant. Business Owner-1 provided HSI with a copy of WILLIAMS'S New York State driver's license. Business Owner-1 also stated that he believed WILLIAMS and Victim-1 were business partners. On or about July 15, 2020, HSI again spoke with Business Owner-1, who stated that the previous evening, WILLIAMS attempted to gain access to mailbox 174, and when WILLIAMS was told that the mailbox had been locked due to nonpayment of the rental fee, WILLIAMS paid the overdue amount and made rental payments for the mailbox for the coming year.

19. On or about February 16, 2021, the Honorable Katharine H. Parker, United States Magistrate Judge for the Southern District of New York, issued a warrant for the search of WILLIAMS'S Residence. On or about February 24, 2021, agents from HSI, NYSOIG and the Port Authority of New York and New Jersey conducted a search of WILLIAMS'S Residence. In the course of the search, law enforcement recovered, among other items, credit cards in multiple individuals' names, mail

addressed to the Katonah Ave Address and mail in the name of Victim-1.

20. On or about February 19, 2021, the Honorable William I. Garfinkel, United States Magistrate Judge for the District of Connecticut, issued a warrant for the search of WILLIAMS's Office. On or about February 24, 2021, agents from HSI, NYSOIG and the Port Authority of New York and New Jersey a search of WILLIAMS's Office. In the course of the search, law enforcement recovered, among other items, the following: an identification card printer, over one thousand holograms bearing the names of various states, approximately three thousand blank ID cards, approximately 11 packages of laminate sleeves, approximately three fake Social Security cards, over 100 fake ID cards, several dozen fake OSHA cards, credit cards bearing Victim-1's name, and one U.S. passport in the name of another individual ("Individual-2").

#### WILLIAMS'S Theft and Fraudulent Use of Victim-1's Identity

21. Based on my conversation with another HSI Special Agent ("Special Agent-1"), I have learned that MICHAEL KRUISE WILLIAMS, the defendant, provided his Westchester County Probation Officer with the address of WILLIAMS's Residence as his home address.

22. Based on my review of account records from Financial Institution-1, I have learned the following, in substance and in part:

a. On or about January 12, 2018, by online application, a checking account ending in 9335 ("Account-1") was opened at Financial Institution-1 in the name of Victim-1. The application lists WILLIAMS's Residence as the residential address, and also lists a particular address in Whitestone, New York (the "Whitestone Address") as a previous address. A New York State-issued identification was provided as part of the application. The user opened the account using a particular IP address ending in .50 (the ".50 IP Address"). Based on a review of subscriber information provided by Apple, I have learned that multiple Apple accounts have billing profiles registered using the .50 IP Address, including an Apple account in the name of "Michael Williams,"<sup>4</sup> and list WILLIAMS's Residence as the associated address.

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<sup>4</sup> Based on my review of subscriber information provided by Apple, I have learned that other accounts registered using the .50 IP Address are registered under names including "Mike Will" and "Mike

b. Between in or about January 2018 and at least in or about April 2020, several dozen transactions posted to Account-1, including debit card purchases, ATM withdrawals and deposits, the deduction of service charges and the depositing of interest. In total, over \$10,000 of debits and over \$8,000 in credits posted to the account.

c. On or about February 5, 2018, fourteen checks were deposited into Account-1, totaling approximately \$3,923.40, from various payors, each made out to a utility company ("Utility Company-1") located only a few hundred feet from WILLIAMS's Residence. The checks were endorsed with a signature that appears to be the name of Victim-1, "c/o [Utility Company-1]". Based on my training, experience, and participation in this investigation, I believe that MICHAEL KRUISE WILLIAMS, the defendant, intercepted checks intended for Utility Company-1 by stealing Utility Company-1's mail, then fraudulently endorsed them with Victim-1's name, and deposited them into Account-1, converting the proceeds to his own use.

d. Between on or about February 16, 2018 and February 18, 2018, three checks were issued from Account-1 to MICHAEL KRUISE WILLIAMS, the defendant, totaling approximately \$2,900. The memo of two checks stated, "Website Payment," and the memo of the third check stated, "Website Deposit." Based on my review of account records from Financial Institution-2, I have learned that these checks were signed by "Frank B" on the front, endorsed on the reverse, deposited into an account in the name of WILLIAMS at Financial Institution-2.

23. Based on a review of records from Coinbase, I have learned that there is a Coinbase account registered to "Michael Williams" ("WILLIAMS'S Coinbase Account"). The registered physical address for WILLIAMS'S Coinbase Account is Williams's Residence, and the account lists associated financial accounts at Financial Institution-1 in the name of Victim-1, including Account-1.

24. Based on my conversation with Special Agent-1, who spoke with Victim-1 on or about July 21, 2020, I have learned the following, in substance and in part:

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Cruz," which I believe, based on training, experience and participation in this investigation, to be aliases for MICHAEL KRUISE WILLIAMS, the defendant.

a. Victim-1 resides at the Whitestone Address. Victim-1 has never lived at the address of WILLIAMS's Residence, and has never rented a private mailbox in his name (including a mailbox on Katonah Ave in Bronx, New York).

b. Victim-1 stated that he had had his identity stolen a few years earlier, possibly from an email phishing scheme.


c. Victim-1 does not know MICHAEL KRUISE WILLIAMS, the defendant. Victim-1, a retired schoolteacher, does not have a business partner.

25. Based on my review of a website maintained by the Federal Deposit Insurance Corporation ("FDIC"), I have learned that the deposits of Financial Institution-1 are insured by the FDIC.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of MICHAEL KRUISE WILLIAMS and PEDRO VASQUEZ, the defendants, and that they be arrested, and imprisoned or bailed, as the case may be.

/s/ Thomas E. Wilbert (credentials inspected)(via Microsoft Teams)  
THOMAS E. WILBERT  
Special Agent  
Homeland Security Investigations

Sworn to me through the transmission of this Affidavit by reliable electronic means, pursuant to Federal Rules of Criminal Procedure 4.1, this  
18th Day of January, 2022

  
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THE HONORABLE PAUL E. DAVISON  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK